

1 THOMAS M. FERLAUTO (SBN 155503)
2 LAW OFFICE OF THOMAS M. FERLAUTO, APC
3 25201 Paseo de Alicia, Suite 270
4 Laguna Hills, California 92653
5 Telephone: 949-334-8650
6 Fax: 949-334-8691
7 Email: TMF@lawofficeTMF.com

8 Attorney for Plaintiff, JOSHUA ASSIFF

9 PATRICK E. STOCKALPER, SBN 156954
10 MOLSHREE GUPTA, SBN 275101
11 KJAR, MCKENNA & STOCKALPER, LLP
12 841 Apollo Street, Suite 100
13 El Segundo, California 90245
14 Telephone (424) 217-3026
15 Facsimile (424) 367-0400
16 pstockalper@kmslegal.com
17 mgupta@kmslegal.com

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19 Attorneys for Defendants,
20 **COUNTY OF LOS ANGELES and**
21 **DEPUTY WILLIAMS**
22 *(Exempt from filing fees pursuant to
23 Government Code § 6103)*

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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JOSHUA ASSIFF,

Plaintiff,

v.

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**COUNTY OF LOS ANGELES;
38 SHERIFF DEPUTY BADGE
39 NUMBER 404532;
40 And DOES 1 through 10,**

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Defendants.

Case No. 2:22-cv-05367 RGK (MAAx)

JOINT WITNESS LIST

Action Filed: August 3, 2022
Pretrial Conference: July 10, 2023
Trial Date: July 25, 2023

Assigned to: Hon. R. Gary Klausner,
District Judge, Courtroom 850

1 Plaintiff, JOSHUA ASSIFF (hereinafter "Plaintiff") and Defendants
2 COUNTY OF LOS ANGELES and TRAVIS KELLY (hereinafter "Defendants")
3 hereby respectfully submit the following JOINT WITNESS LIST.

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5 Plaintiff's Witnesses:

Name	Subject	Direct	Cross	Re-Direct
Joshua Assiff	Plaintiff	3.0	3.0	1.0
Johnathon Danials	Plaintiff's teammate/carpooler, percipient witness of Plaintiff's injuries.	.5	0.5	.25
Kelly Assiff	Plaintiff's father, percipient witness of Plaintiff's injuries.	.5	1.0	.5
Payam Yermain, D.C.	Plaintiff's chiropractor, percipient witness of Plaintiff's injuries.	.25	1.0	.25
Rafael A. Rosado- Cosme MD	Plaintiff's treating physician, percipient witness of Plaintiff's injuries.	.25	.5	.25
Darrin D. Privett, M.D.	Plaintiff's treating physician, percipient witness of Plaintiff's injuries.	.25	0.5	.25

1	Max Schwartz	Plaintiff's cousin, percipient witness of Plaintiff's injuries	.25	0.5	.25
2	Travis Kelly	Defendant	3.0	3.0	1.0
3	Jeffrey Nobel	Plaintiff's Police Practices Expert	3.0	3.0	1.0
4	Roosevelt Johnson	LASD Captain, Sergeant Kelly's Supervisor for Service Comment Report # 236956	.5	0.5	.25
5	Jim Curio *	Video technician to establish foundations for video freeze frames, blow- up, etc. (if necessary)	.25	0.5	.25
6	Lieutenant Joseph Fender LASD	Defendant Kelly's supervisor 7/19-6/21	.5	0.5	.25
7	Michael W. Prottung LASD 466205	Supervisor investigating Defendant Kelly's use of force 015-01439-5640-057	.5	0.5	.25
8	Sergeant, Richard Cohen LASD 220764	Supervisor for Defendant Kelly during Service Comment Report # 236956	.5	0.5	.25
9	Justine Diez, Captain LASD	Supervisor for Defendant Kelly during Service Comment Report # 258463 and at time of incident	.5	1.0	.25
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1	Sergeant Troy	Watch Commander For	.5	0.5	.25
2	Rodriguez LASD	Service Comment Report #			
3	476740	254607			
4	Salvador Becerra,	Supervisor for Defendant	.5	0.5	.25
5	Captain LASD	Kelly during Service			
6		Comment Report # 255777			
7	Lieutenant John	Watch Commander For	.5	0.5	.25
8	Rush LASD	Service Comment Report #			
9	257049	232314			
10	Capatain Matthew	Supervisor for Defendant	.5	0.5	.25
11	S. Vander Horch,	Kelly during Service			
12	LASD	Comment Report # 246263			
13	Lieutenant	Supervisor for Defendant	.5	0.5	.25
14	Rodney	Kelly at time of incident –			
15	Loughridge LASD	should have been			
16		summoned at Plaintiff's			
17		request			
18	Sergeant Keith R.	Watch Commander at time	.5	1.0	.5
19	Green LASD	of incident			
20	464259				
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22 Plaintiff reserves the right to supplement this list based upon late discovery. This list
23 does not include witnesses for impeachment or rebuttal.
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1 Defendants' Witnesses:

2	Name	Subject	Direct	Cross	Re-Direct
3	Sergeant Tavis Kelly	Defendant	4.0	2.0	1.0
4	Deputy Joshua Clark	Percipient witness of incident	2.0	1.0	0.5
5	Deputy Garrett Gallegos	Percipient witness of incident	1.0	1.0	0.5
6	Deputy T. Cohen	Percipient witness of incident	1.0	.75	0.5
7	Sergeant Keith Greene	Watch Commander - Use of Force Review and Incident Analysis	2.0	.75	0.5
8	Detective R. De La Maza	Incident investigation	1.0	.75	0.25
9	Captain Justin Diez	Use of Force Reports	1.0	.75	0.5
10	Commander Christopher Reed	Incident investigation	1.0	.75	0.25
11	R. Elsee	Incident investigation	1.0	.25	0.25
12	Sergeant Jacob (Employee No. 464272)	Incident investigation	1.0	.25	0.25
13	Sergeant Gonzalez (Employee No. 516336)	Incident investigation	1.0	.25	0.25

1	Deputy Brandon	Traffic stop policies and	1.5	1.0	0.5
2	Wicker	procedures			
3	Lieutenant	De-escalation policies and	2.0	1.0	0.75
4	Annadennise Briz	procedures			
5	Sergeant Eric	Use of force policies and	2.0	1.0	0.75
6	Odenthal	procedures			
7	Michael Gray	Defendants' Police	3.0	1.5	1.0
8		Practices Expert			
9	Rafael A. Rosado-	Plaintiff's medical treater	0.5	.25	0.25
10	Cosme MD				
11	Payam Yermain,	Plaintiff's chiropractic	1.0	.25	0.25
12	D.C.	treater			
13	Michael Van	Plaintiff's medical treater	0.5	.25	0.25
14	Tran, MD				
15	Darrin D. Privvet,	Plaintiff's medical treater	0.5	.25	0.25
16	M.D.				
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19 Defendants reserve the right to supplement this list based upon late discovery. This
20 list does not include witnesses for impeachment or rebuttal.
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22 DATED: June 16, 2023 The Law Office Of Thomas M. Ferlauto, APC
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25 By: 
26 Thomas M. Ferlauto
27 Attorney For: Plaintiff, JOSHUA ASSIFF
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2 DATED: June 16, 2023

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4 KJAR, McKENNA & STOCKALPER, LLP

5 By: /s/ Molshree Gupta

6 Molshree Gupta

7 Attorney For: Defendants COUNTY OF LOS
8 ANGELES and TRAVIS KELLY

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